

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANTHONY COULTRIP, *et al.*,

Plaintiffs,

-against-

PFIZER, INC.,

Defendant.

ECF Case

No. 06 Civ. 9952 (JCF)

Consolidated with:
06 Civ. 15200 (JCF)
07 Civ. 4532 (JCF)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Class Certification, the Declaration of Elizabeth S. Saylor, dated June 9, 2011, and the exhibits annexed thereto, and upon all prior proceedings and pleadings, plaintiffs, by their counsel, will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, before the Honorable James C. Francis, IV, United States Magistrate Judge, for an Order:

1. Certifying three separate class actions pursuant to Fed. R. Civ. P. 23(b)(3) on behalf of all persons who are or were employed by defendant Pfizer, Inc. as a "Healthcare Representative," a "Professional Healthcare Representative," a "Therapeutic Specialty Representative," an "Institutional Healthcare Representative," a "Specialty Healthcare Representative," a "Specialty Representative," a "Sales Representative," and/or any similar position (collectively referred to as "Pharmaceutical Reps" or "Reps"):

A. from November 2, 2002 to date, in the state of California, with Benaias Albarran, Amanda Boal, and Fernando Oblitas-Rios as class representatives;

B. from November 15, 2000 to date, in the state of New York, with Angela Cohen and Ayisha Jeter as class representatives; and

C. from October 19, 2003 to date, in the state of Illinois, with Anthony Coultrip as class representative; and

2. Designating Emery Celli Brinckerhoff & Abady LLP as Lead Class Counsel for all three classes; Cohelan Khoury & Singer as Liaison Class Counsel for the California Class only; Osborne Law, P.C. as Liaison Class Counsel for the New York Class only; and all plaintiffs' counsel of record in the original *Coultrip v. Pfizer, Inc.* (06 Civ. 9952) action as Class Counsel for all three classes.

Dated: June 9, 2011
New York, New York

Respectfully submitted,

EMERY CELLI BRINCKERHOFF
& ABADY LLP

By: _____ /s/ _____

Matthew D. Brinckerhoff
Elizabeth S. Saylor
Samuel Shapiro
75 Rockefeller Plaza, 20th Fl.
New York, New York 10019
Tel.: (212) 763-5000
Fax: (212) 763-5001
*Attorneys for Named Plaintiffs
except Jeter and Obilatas-Rios; FLSA
collective action members; and
California, New York and Illinois
putative class members*

Daniel A. Osborn
Adrianne J. Leven
OSBORN LAW, P.C.
295 Madison Avenue, 39th Fl.
New York, New York 10017

Tel.: (212) 725-9800

Fax: (212) 725-9808

*Attorneys for Plaintiff Jeter
and New York putative class members*

Michael D. Singer*

Timothy D. Cohelan*

J. Jason Hill*

COHELAN KHOURY & SINGER

605 C Street, Suite 200

San Diego, California 92101

Tel.: (619) 595-3001

Fax: (619) 595-3000

*Attorneys for Plaintiff Oblitas-Rios
and California putative class members*

* Admitted Pro Hac Vice